

LEWIS BRISBOIS BISGAARD & SMITH LLP

JON P. KARDASSAKIS, SB# 90602

Jon.Kardassakis@lewisbrisbois.com

ELEONORA ANTONYAN, SB# 338379

Eleonora.Antonyan@lewisbrisbois.com

633 West 5th Street, Suite 4000

Los Angeles, California 90071

Telephone: 213.250.1800

Facsimile: 213.250.7900

Attorneys for Defendant,
CEDARS-SINAI MEDICAL CENTER

WINSTON & STRAWN LLP

Daniel M. Blouin (admitted pro hac vice)

dblouin@winston.com

Thomas G. Weber (admitted pro hac vice)

tgweber@winston.com

Winston & Strawn LLP

35 W. Wacker Drive

Chicago, IL 60601-9703

Telephone: (312) 558-5600

Shawn R. Obi (SBN: 288088)

sobi@winston.com

Winston & Strawn LLP

333 S. Grand Avenue

Los Angeles, CA 90071-1543

Telephone: (213) 615-1700

Attorneys for Defendant,
UNITED NETWORK FOR ORGAN
SHARING

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ANTHONY RANDALL,

Plaintiff,

vs.

UNITED NETWORK FOR ORGAN
SHARING; CEDARS-SINAI
MEDICAL CENTER,

Defendants.

Case No. 2:23-CV-02576-MEMF

Hon. Maame Ewusi-Mensah Frimpong

**SUPPLEMENT TO DEFENDANTS'
REQUEST FOR CLARIFICATION
REGARDING DAUBERT HEARING**

1 On November 21, 2025, Defendants United Network for Organ Sharing
2 (“UNOS”) and Cedars-Sinai Medical Center (“Cedars”) submitted a request for
3 clarification regarding the hearing on Defendants’ Motion to Exclude Opinions of
4 David Cutler (ECF 105), currently scheduled for hearing on December 11, 2025
5 (“Request”). ECF 220.

6 In relevant part, the Request stated the parties previously filed a joint
7 stipulation (currently pending before the Court) that included Plaintiff’s agreement
8 to support Defendants’ request to permit the live testimony of Mr. Gary Harvey at
9 the hearing on Defendants’ motion, and make Dr. David Cutler available for live
10 testimony should the Court believe it helpful. See ECF 155. The Request provided
11 notice to the Court that Defendant Cedars’ counsel was not available on December
12 11, 2025 and that Plaintiff had advised Defendants that Dr. Cutler was similarly
13 unavailable.

14 Defendants supplement the Request to advise the Court that Cedars’ counsel
15 has resolved a conflict arising from a trial in a separate litigation and is available on
16 December 11, 2025.

17 This supplement does not change the substance of the Request. Defendants
18 respectfully request clarification as to whether the Court intends to hear testimony
19 during the hearing on Defendants’ motion to exclude Dr. Cutler’s opinions.

20
21 DATE: December 2, 2025

LEWIS BRISBOIS BISGAARD & SMITH LLP

22
23
24 By: /s/ Jon Kardassakis

25 Jon Kardassakis

26 Eleonora Antonyan

27 *Attorneys for Defendant Cedars-Sinai*
28 *Medical Center*

1 DATE: December 2, 2025

WINSTON & STRAWN LLP

2
3 By: /s/ Daniel M. Blouin

4 *Daniel M. Blouin (Admitted pro hac vice)*
5 *dblouin@winston.com*

6 *Thomas G. Weber (Admitted pro hac vice)*
7 *tgweber@winston.com*

8 *Winston & Strawn LLP*

9 *35 W. Wacker Drive*

10 *Chicago, IL 60601-9703*

11 *Telephone: (312) 558-5600*

12 *Facsimile: (312) 558-5700*

13 *Shawn R. Obi (SBN: 288088)*

14 *sobi@winston.com*

15 *Winston & Strawn LLP*

16 *333 S. Grand Avenue*

17 *Los Angeles, CA 90071-1543*

18 *Telephone: (213) 615-1700*

19 *Facsimile: (213) 615-1750*

20 *Attorneys for Defendant United Network*
21 *for Organ Sharing*

22 I, Jon Kardassakis, attest that all other signatories listed, concur in this filing's
23 content and have authorized this filing.

24 DATE: December 2, 2025

LEWIS BRISBOIS BISGAARD & SMITH LLP

25 By: /s/ Jon Kardassakis

26 Jon Kardassakis

27 Eleonora Antonyan

28 *Attorneys for Defendant Cedars-Sinai Medical*
Center

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2025, a true and correct copy of the foregoing **SUPPLEMENT TO DEFENDANTS' REQUEST FOR CLARIFICATION REGARDING DAUBERT HEARING** was filed electronically with the Clerk of the Court using the CM/ECF System. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties listed on the CM/ECF System. Parties may access this filing through the Court's electronic filing system.

DATE: December 2, 2025

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Jon Kardassakis

Jon Kardassakis

Eleonora Antonyan

Attorneys for Defendant Cedars-Sinai Medical Center